1 2 3 4 5	PATRICK E. STOCKALPER, SBN 15 MOLSHREE GUPTA, SBN 275101 KJAR, MCKENNA & STOCKALPER 841 Apollo Street, Suite 100 El Segundo, California 90245 Telephone (424) 217-3026 Facsimile (424) 367-0400 pstockalper@kmslegal.com mgupta@kmslegal.com	56954 L, LLP	
6	Attorneys for Defendants, COUNTY OF LOS ANGELES and SERGEANT TRAVIS KELLY (Defendants is exempt from filing fees pursuant to Government Code § 6103)		
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9	UNITED STATES DISTRICT COURT		
10	CENTRAL DISTRICT OF CALIFORNIA		
11	JOSHUA ASSIFF,	Case No.: 2:22-cv-05367 RGK(MAAx)	
12	D1 ' 4'CC		
13	Plaintiffs,	DECLARATION OF LIEUTENTANT JENNIFER ROTH IN SUPPORT OF	
14	V.	DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO ENFORCE	
15	COUNTY OF LOS ANGELES;	SETTLEMENT	
16	SHERIFF DEPUTY BADGE	A .' F'1 1 A	
17	NUMBER 404532; And DOES 1 through 10,	Action Filed: August 3, 2022 Pretrial Conference: July 10, 2023	
18		Trial Date: July 25, 2023	
19	Defendants.	Assigned to:	
20		Assigned to: Hon. R. Gary Klausner, District Judge	
21		Courtroom 850	
22		All Discovery Matters Referred to:	
23		Hon. Maria A. Audero, District Judge	
24			
25	DECLARATION OF LIEUTENANT JENNIFER M. ROTH		
26	I, Lieutenant Jennifer M. Roth, declare as follow:		
27		s employee and am a Lieutenant with the Los	
28	Angeles County Sheriff's Department ("LASD" or "Department").		

- 2. This declaration is made in support of Defendant's Opposition to Plaintiff's Motion to Enforce Settlement.
- 3. I am currently assigned as one of the three Lieutenants over LASD's Risk Management Bureau and oversee the Corrective Action Plan Unit. In that capacity, I have personal knowledge of, and am familiar with, the status of the settlement in the above-captioned action.
- 4. The settlement in this case was contingent upon the County of Los Angeles approval process. The Settlement Agreement in this case was signed by all parties on August 14, 2023.
- 5. The Los Angeles County Board of Supervisors has established protocols in lawsuits. Where the liability of the settlement or judgment exceeds \$100,000, a Corrective Action Plan (CAP) (a confidential document) and a Summary Corrective Action Plan (SCAP) (a public record) must be produced.
- 6. As such, after the Settlement Agreement was fully executed on August 14, 2023, the settlement moved on to the Corrective Action Plan phase. The Corrective Action Plan process involves several steps in its preparation, including investigation, drafting, and revisions, followed by approval by multiple levels of LASD personnel.
- 7. In March 2023, the LASD Risk Management Bureau, previously under the Professional Standards Division, became part of the Office of Constitutional Policing. At that time, a new format and structure of the Corrective Action Plans were implemented within the Department. With said change, the format and structure of Corrective Action Plans required all earlier pending plans to be revised.
- 8. The draft due for the Corrective Action Plan was December 5, 2023; however, due to the aforementioned structural changes, staffing challenges, and a backlog of fifteen (15) pending CAP/SCAPs and three (3) court orders, the final due date for the CAP/SCAP in this case was further delayed from the original date of February 27, 2024.

- 9. Upon completion of the Corrective Action Plan for this matter, it was reviewed by both the LASD Risk Management Bureau and the CEO of Risk Management for Los Angeles County. Upon the concurrence of the CEO of Risk Management for Los Angeles County, the document was thereafter sent to the respective unit's Operations (Lieutenant and Captain) for their review and signature. The documents were then sent to the Commander of the Office of Constitutional Policing for review and signature. Next, the plan was sent to the Assistant Sheriff of Countywide Services Division for approval and signature. That entire process is complete.
- 10. After the final signature process for LASD was complete, the Plan was provided to the CEO of Risk Management for Los Angeles County for final review and signatures.
- 11. The matter was then placed on the Contract Cities Claims Board Agenda for October 2, 2024. Upon approval by the Contract Cities Claims Board, the matter has been placed on the Public Safety Cluster Review Agenda for November 13, 2024. After the Cluster Agenda has been advised of the settlement, the matter will go before the County Board of Supervisors for approval, which is typically within 30 days.
- 12. After the County Board of Supervisors' approval, the settlement documents and Plaintiffs payment instructions will be submitted to the Los Angeles County Auditor-Controller, and then the settlement payment will be issued.

I declare under penalty of perjury under the laws of the State California that the foregoing is true and correct.

Executed on October 28, 2024, at Los Angeles, California.

/s/ Lieutenant Jennifer M. Roth
Lieutenant Jennifer M. Roth

CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California; I am over the age of eighteen years and not a party to the within action; my business address is 841 Apollo Street, Suite 100, El Segundo, California 90245.

On October 28, 2024, I served the foregoing document described as **DECLARATION OF LIEUTENTANT JENNIFER ROTH IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO ENFORCE SETTLEMENT** on all interested parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

By Mail I caused such envelope(s) to be deposited in the mail at El Segundo, California. The envelope was mailed with postage thereon fully prepaid and addressed to the parties listed on the Service List. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 day after date of deposit for mailing in affidavit.

XX **By Email** Based upon a court order or an agreement of the parties to accept electronic service, I caused the documents to be sent to the persons at the electronic service addresses listed in the Service List. My email address is mnixon@kmslegal.com.

By Personal Service I caused such document to be Personally Served on the parties listed in the Service List.

XX **State** I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 28, 2024, at El Segundo, California.

Maria Nixon

SERVICE LIST

Assiff, Joshua vs. County of Los Angeles, et al.

Central District- Case No.: 2:22-cv-05367 RGK(MAAx)

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